



0000033192

COVER SHEET

INTERVENTION

18

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL CENTER

RECEIVED

CASE/COMPANY NAME:

DOCKET NO. T-04000A-01-0208 2001 APR -3 P 3:33

IN THE MATTER OF THE APPLICATION OF
TELSEON CARRIER SERVICES, INC. FOR A
CERTIFICATE OF CONVENIENCE AND
NECESSITY TO PROVIDE FACILITIES-BASED
AND RESOLD LOCAL EXCHANGE, EXCHANGE
ACCESS, AND INTEREXCHANGE
TELECOMMUNICATIONS SERVICES

Arizona Corporation Commission
DOCKETED

AZ CORP COMMISSION
DOCUMENT CONTROL

APR 03 2001

DOCKETED BY

NATURE OF ACTION OR DESCRIPTION OF DOCUMENT

Please mark the item that describes the nature of the case/filing:

01 NEW APPLICATIONS

NEW CC&N
RATES
INTERIM RATES
CANCELATION OF CC&N
DELETION OF CC&N TERRITORY
EXTENSION OF CC&N (TERRITORY)
TARIFF-NEW (NEXT OPEN MEETING)
REQUEST FOR ARBITRATION
(Telecommunication Act)
FULLY OR PARTIALLY ARBITRATED
INTERCONNECTION AGREEMENT
(Telecom. Act)
VOLUNTARY INTERCONNECTION
AGREEMENT (Telecom. Act)

MAIN EXTENSION
CONTRACT/AGREEMENTS
COMPLAINT (Formal)
RULE VARIANCE/WAIVER REQUEST
SITING COMMITTEE CASE
SMALL WATER COMPANY-SURCHARGE (Senate Bill 1252)
NOTICE OF OPPORTUNITY
SALE OF ASSETS & TRANSFER OF OWNERSHIP
SALE OF ASSETS & CANCELLATION OF CC&N
FUEL ADJUSTER/PGA
MERGER
FINANCING
MISCELLANEOUS
Specify

02 REVISIONS/AMENDMENTS TO
PENDING OR APPROVED MATTERS

APPLICATION
COMPANY
DOCKET NO.

TARIFF
PROMOTIONAL
DECISION NO.
DOCKET NO.
COMPLIANCE
DECISION NO.
DOCKET NO.

MISCELLANEOUS FILINGS

04 AFFIDAVIT
12 EXCEPTION
18 REQUEST FOR INTERVENTION
48 REQUEST FOR HEARING
24 OPPOSITION
50 COMPLIANCE ITEM FOR APPROVAL

29 STIPULATION
38 NOTICE OF INTENT
(Only notification of future action/no action necessary)
43 PETITION
46 NOTICE OF LIMITED APPEARANCE
X 39 OTHER
Specify: Motion for Leave to Intervene

Darcy Renfro/Qwest Corporation
Print Name of Applicant/Company/Contact Person

INTERVENTION

ORIGINAL

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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission 2001 APR -3 P 3: 33

1 WILLIAM A. MUNDELL
Chairman

DOCKETED

2 JIM IRVIN
Commissioner

APR 03 2001

AZ CORP COMMISSION
DOCUMENT CONTROL

3 MARC SPITZER
Commissioner

DOCKETED BY

4
5 IN THE MATTER OF THE APPLICATION OF
6 TELSEON CARRIER SERVICES, INC. FOR
A CERTIFICATE OF CONVENIENCE AND
7 NECESSITY TO PROVIDE FACILITIES-
BASED AND RESOLD LOCAL EXCHANGE,
8 EXCHANGE ACCESS, AND INTEREXCHANGE
TELECOMMUNICATIONS SERVICES

DOCKET NO. T-04000A-01-0208

MOTION FOR LEAVE TO INTERVENE

9
10 Pursuant to Rule 14-3-105, Arizona Administrative Code, Qwest
11 Corporation ("Qwest"), applies to this Commission for an order
12 granting leave to intervene in the above-captioned proceeding.

13 The Commission should grant Qwest leave to intervene in this
14 matter because Qwest is directly and substantially affected by
15 these proceedings. Telseon Carrier Services, Inc. ("Telseon")
16 is seeking a Certificate of Convenience and Necessity to provide
17 facilities-based and resold local exchange, exchange access and
18 interexchange telecommunications services within the State of
19 Arizona. For many years, Qwest exclusively provided these
20 services within the State of Arizona. As a result, Telseon will
21 be required to interconnect with Qwest, and the two
22 telecommunications companies will have to provide services to each
23 other if the Certificate is granted. Under these circumstances,
24 Qwest clearly has a substantial and direct interest in the outcome
25 of Telseon's application.

26 Further, Qwest's participation in the proceeding will not

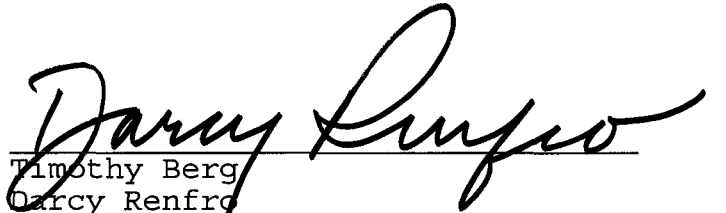
1 unduly broaden the issues raised. The name, address and telephone
2 number of the person upon whom service of all documents is to be
3 made is:

4 Timothy Berg
5 FENNEMORE CRAIG, P.C.
6 3003 North Central Avenue
7 Suite 2600
8 Phoenix, Arizona 85012
9 (602) 916-5421

10 RESPECTFULLY SUBMITTED this 3rd day of April, 2001.

11 FENNEMORE CRAIG, P.C.

12
13
14 By


15 Timothy Berg
16 Darryl Renfro
17 3003 North Central Avenue, Suite 2600
18 Phoenix, Arizona 85012
19 (602) 916-5421
20 Attorneys for
21 Qwest Corporation

22 ORIGINAL and 10 copies of the
23 foregoing hand-delivered for
24 filing this 3 day of
25 April, 2001 to:
26 Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, Arizona 85007

1 COPY of the foregoing hand-delivered
this 3 day of April, 2001 to:

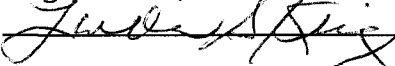
2 Chris Kempley, Chief Counsel
3 ARIZONA CORPORATION COMMISSION
Legal Division
4 1200 West Washington
Phoenix, Arizona 85007

5 Deborah R. Scott
6 Director, Utilities Division
ARIZONA CORPORATION COMMISSION
7 1200 West Washington
Phoenix, Arizona 85007

8
9 COPY of the foregoing mailed
this 3 day of April, 2001 to:

10 Rogena Harris
11 Alexander Stokas
Swidler Berlin Shereff Friedman, LLP
12 3000 K Street, NW, Suite 300
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13 Steve Miller
14 7887 East Belleview, Suite 600
Englewood, CO 80111

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